

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

BRYAN GRANT, an individual

Plaintiff,

v.

Case No. CIV-13-78-D

SHELTER MUTUAL INSURANCE,  
COMPANY, a Foreign Insurance  
Company Doing Business n Oklahoma,

Defendant.

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**NOTICE OF REMOVAL OF CIVIL ACTION**

COMES NOW Defendant, Shelter Mutual Insurance Company, Petitioner herein, and removes this case from the District Court of Payne County, State of Oklahoma to the United States District Court for the Western District of Oklahoma on the following grounds:

1. Petitioner, Shelter Mutual Insurance Company, is the Defendant in a civil action commenced on December 12, 2012, filed, in the District Court of Payne County, being Case No. CJ-2012-603, entitled Bryan Grant v. Shelter Mutual Insurance Company, a Foreign Insurance Company, doing business in Oklahoma.

2. Pursuant to LCvR81.2 attached hereto is a copy of the state docket sheet as Exhibit "1" and is incorporated herein by reference.

3. A file-stamped copy of Plaintiff's Original Petition is attached hereto as Exhibit "2" and a copy of the Original Summons is attached hereto as Exhibit "3" and are incorporated herein by reference.

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1332 and is one in which the Defendant, Shelter Mutual Insurance Company, is entitled to remove to this Court, pursuant to 28 U.S.C. §1441 et seq., where the matters in controversy exceeds the sum of Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs; and the action is between citizens of different states, as at the time of the commencement of this action and at all times subsequent thereto, the Defendant, Shelter Mutual Insurance Company, has been and is still a citizen of the State of Missouri and the Plaintiff, Bryan Grant, has been and still is a citizen of the State of Oklahoma.

5. This Petition is filed with this Court within thirty (30) days after service upon the Petitioners of Summons by which this case became removable.

WHEREFORE, Petitioner, Shelter Mutual Insurance Company, prays that the above action now pending in the District Court of Payne County, State of Oklahoma, being Case No. CJ-2012-603, be removed from that Court to this Court.



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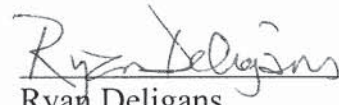
E-Mail: [dlb@dlb.net](mailto:dlb@dlb.net)

Attorneys for Defendant Shelter Mutual Insurance Company

**CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2013, a true and correct copy of the foregoing instrument was served upon counsel of record by certified mail, return receipt requested, addressed as follows:

Jacob W. Bilby, OBA #22063  
Patrick Collogan, OBA #30529  
Martin Jean and Jackson  
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Ryan Deligans

Not of Removal.wpd(1413.0380)